



**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY**

Caption in compliance with D.N.J. LBR 9004-2(c)

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**Order Filed on May 31, 2017 by
Clerk, U.S. Bankruptcy Court -
District of New Jersey**

In re:

Case No.: 10-28457 (SLM)

WRS HOLDINGS, LLC, et al.,

Chapter 7

Debtors.¹

Judge: Stacey L. Meisel

**STIPULATION AND CONSENT ORDER REGARDING FINAL FEE APPLICATION OF
FORMAN HOLT ELIADES & YOUNGMAN LLC AND ESTATE ADMINISTRATION**

The relief set forth on the following pages, numbered two (2) and (3) is hereby
ORDERED.

DATED: May 31, 2017

**Honorable Stacey L. Meisel
United States Bankruptcy Judge**

¹ The Debtors are the seven jointly administered debtors in the above captioned case. The name and case number for each of the Debtors are as follows: WRS Holdings, LLC, Case No. 10-28465, WRS, LLC, Case No. 10-28461, Woods Restoration Services, LLC, Case No. 10-28465, Woods Restoration Services of South Carolina, LLC, Case No. 10-28471; Woods Restoration Services of Montclair, New Jersey, LLC, Case No. 10-28474; WRS, Inc., Case No. 10-28478; and Environmental Remediation Concepts, LLC, Case No. 10-28476.

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THIS MATTER having come before the Court by Charles M. Forman, the Chapter 7 Trustee of the above captioned jointly administered Debtors (the "Trustee"), by and through his attorneys, LeClairRyan LLP, for entry of an order granting the final fee application of Forman Holt Eliades & Youngman LLC ("FHEY") ("Final Fee Application"); the Trustee and Ambrose Pine, LLC ("Secured Party"), by and through its attorneys, Schiff Hardin, LLP (collectively, the Trustee and Secured Party shall be referred to as the "Parties") hereby enter into this Stipulation and Consent Order (the "Order") and stipulate as follows:

WHEREAS, the hearing on the Final Fee Application is scheduled to be heard on May 30, 2017;

WHEREAS, the Secured Party has shared a draft Objection ("Secured Party Objection") with the Trustee;

WHEREAS, to allow the parties time to discuss the Secured Party Objection and concerns raised therein, the Trustee agreed to extend the date by which the Secured Party was required to file its Secured Party Objection to May 24, 2017;

WHEREAS, for the reasons stated in the Secured Party Objection, the Secured Party has requested that the Trustee pay all the funds due the Secured Party on account of its secured claim ("Secured Claim") and superpriority claim ("Superpriority Claim"), each as allowed by this Court by Stipulation and Consent Order entered by this Court on December 14, 2010 ("Secured Party Claim") [D.E. 174];

WHEREAS, the Trustee has expressed a need for additional time to close the Debtors' cases, and to complete further analysis regarding general unsecured claim allowance and estate distributions, and the amount to which Secured Party is entitled to in connection with the Superpriority Claim which he anticipates completing on or about December 31, 2017; and

WHEREAS, as memorialized by the Secured Party Objection, the Secured Party believes that it is entitled to the immediate payment of its Secured Party Claim from available estate funds, and was

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prepared to file the Secured Party Objection absent agreement on the terms memorialized by this Stipulation;

NOW THEREFORE, the Trustee and Secured Party hereby stipulate and agree that:

1. Within five (5) business days after the filing of this Stipulation on the docket of the Court, the Trustee shall pay Secured Party the sum of \$19,808.11 in immediately available funds, payable to "Ambrose Pine, LLC" in partial satisfaction of its Secured Claim.

2. 3. The Secured Party shall retain and reserve all rights, remedies and objections in connection with the Secured Party Claim, including the right to object to any interim or final Trustee accounting and all fee applications filed in these cases by or on behalf of any professional, including all objections and remedies asserted by Secured Party in its Secured Party Objection.

4. This Stipulation may be executed in one or more counterparts, each of which when so executed and delivered shall be deemed an original, but all of which when taken together shall constitute but one and the same instrument.

Dated: May 24, 2017

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